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7 *Attorneys for Respondents*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 LUIS GONZALAS,

11 Petitioner,

12 vs.

13 BRIAN WILLIAMS, et al.,

14 Respondents.

15 Case No. 2:17-cv-01653-RFB-GWF

16 **UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
ANSWER TO FIRST AMENDED PETITION
(ECF NO. 18)**

17 **(THIRD REQUEST)**

18 Respondents hereby move for an enlargement of time of 1 week from the current due date of
19 April 20, 2020, up to and including April 27, 2020, in which to file their Answer to Luis Gonzalas' First
20 Amended Petition for Writ of Habeas Corpus (ECF No. 18). Respondents make this motion pursuant to
21 Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and based upon the attached declaration
22 of counsel. This is the third enlargement of time sought by Respondents to file the Answer, and the
request is brought in good faith and not for the purpose of delay.

23 DATED: April 20, 2020

24 AARON D. FORD
Attorney General

25 By: /s/ Jessica Perlick
Jessica Perlick (Bar. No. 13218)
Senior Deputy Attorney General

DECLARATION OF JESSICA PERLICK

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JESSICA PERLICK, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada, and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I am assigned to represent Respondents in *Luis Gonzalas v. Brian Williams, et al.*, Case No. 2:17-cv-01653-RFB-GWF, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The Answer to the First Amended Petition is currently due on April 20, 2020.

4. I have been unable with due diligence to timely complete the Answer. I had previously requested a second short extension based on the impact of COVID-19 on all work-related issues, and believed an extra week would be sufficient time.

5. Unfortunately, I fell ill last week, which impeded the progress I was able to make. I have spent significant time trying to complete this Answer, but being sick impacted other obligations in significantly older cases, including a 2001 capital case, which I had to meet before I could turn back to this case. As a result, I am requesting another short extension in which to file the Answer.

6. I have communicated with Petitioner's counsel, C.B. Kirschner, and she does not oppose this request for an extension.

7. Based on the foregoing, I respectfully request an enlargement of time of 1 week, up to and including April 27, 2020, to file the Answer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this Monday, April 20, 2020.

IT IS SO ORDERED:

/s/ Jessica Perlick

Jessica Perlick (Bar No. 13218)
Senior Deputy Attorney General

**RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE**

DATED this 22nd day of April, 2020.

1 CERTIFICATE OF SERVICE

2 I hereby certify that I electronically filed the foregoing *Motion for Enlargement of Time to File*
3 *Answer to First Amended Petition for Writ of Habeas Corpus* (ECF No. 18) (*Third Request*) with the
4 Clerk of the Court by using the CM/ECF system on April 20, 2020.

5 The following participants in this case are registered CM/ECF users and will be served by the
6 CM/ECF system:

7 C.B. Kirschner
8 Assistant Federal Public Defender
9 411 E. Bonneville Avenue, Suite 250
10 Las Vegas, Nevada 89101
11 Cb_Kirschner@fd.org

12 _____
13 /s/ C. Martinez
14 An employee of the Office of the Attorney General

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